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**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
VALDOSTA DIVISION**

<b>UNITED STATES OF AMERICA</b>  <p style="text-align: center;">v.</p> <b>ASHTYN MICHAEL RANCE</b>  <hr style="width: 30%; margin-left: 0;"/>	: : : : : : : :	<b>CRIMINAL NO. 7:21-CR- 5</b>  <b>VIOLATIONS:</b>  <b>16 USC §§ 3372(a)(2) and 3373(d)(1)</b> <b>16 USC §§ 3372(d)(2) and</b> <b>3373(d)(3)(A)(ii)</b> <b>18 USC §§ 922(g)(1) and 924(a)(2)</b>
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**THE GRAND JURY CHARGES:**

**COUNT ONE  
(Lacey Act Trafficking)**

1. The Lacey Act regulates the trafficking and labeling of wildlife, fish, and plants. The Lacey Act makes it unlawful for any person to knowingly “transport, sell, receive, acquire, or purchase in interstate . . . commerce . . . any fish or wildlife [knowing it was] taken, possessed, transported, or sold in violation of any law or regulation of any State.” 16 U.S.C. §§ 3372(a)(2)(A), 3373(d)(1)(B). The Lacey Act also makes it unlawful to knowingly “make or submit any false record, account, or label for, or any false identification of, any fish, wildlife, or plant which has been, or is intended to be . . . transported in interstate . . . commerce.” 16 U.S.C. §§ 3372(d)(2), 3373(d)(3)(A)(ii).

2. The eastern box turtle (*Terrapene carolina carolina*) is a subspecies of the common box turtle (*Terrapene carolina*). The eastern box turtle is native to forested regions of the eastern United States with some isolated populations in the Midwest. The turtles typically reach a length up to six inches and can live more than 100 years. The turtles have a domed carapace, which can display radiated lines or spots. Turtles with colorful markings are particularly prized in the domestic and foreign pet trade market.

3. The spotted turtle (*Clemmys guttata*) is a semi-aquatic turtle native to the eastern United States and Great Lakes region. The turtles typically reach four inches in length and have small, yellow spots on their shells. Turtles with intense and unique spot patterns are sought after in the domestic and foreign pet trade market.

4. The Gaboon viper (*Bitis gabonica*) is a venomous snake native to central and western forested regions of Sub-Saharan Africa. Adult vipers have brown, pink, or purple diamond and stripe patterns. They typically reach six feet in length with two-inch fangs and live approximately 20 years. The viper's venom can cause shock, loss of consciousness, or death in humans.

5. The Official Code of Georgia regulates the sale and shipment of wildlife, including:
- a. The sale or purchase of any protected animal species or parts thereof is prohibited and the possession of any such species or parts thereof is prohibited unless the possession is authorized by a scientific collecting, wildlife exhibition, or other permit or license issued by the Department. Georgia DNR O.C.G.A. § 391-4-10-.06(a)(2).
  - b. Except as otherwise provided by law, rule, or regulation, it shall be unlawful to hunt, trap, fish, take, possess, or transport any nongame species of wildlife.... Georgia DNR § O.C.G.A. 27-1-28(a).
  - c. It shall be unlawful for any person to make use of or possess any wildlife or parts thereof which he knows or reasonably should have known have been taken or possessed contrary to any of the wildlife laws, rules, and regulations. Georgia DNR § O.C.G.A. 27-1-31(a).

d. It shall be unlawful for any person, other than a carrier who has complied with Code Section 27-3-94, to remove, ship, or transport wildlife out of this state except under the following conditions:

(1) The person must have in his possession at the time of such removing, shipping, or transporting the proper wildlife license or permit duly issued to such person by the department;

(2) The person cannot remove from the state more than the bag or possession limits established by law or regulation;

(3) The person shall make a sworn statement, duly attested to by an authorized officer of this state, which statement shall show that the person has lawfully taken such wildlife and that they are not for sale, except as otherwise permitted by the wildlife laws, rules, and regulations, and shall show the number of wildlife being shipped, transported, or removed from the state. One copy of the statement shall be given the carrier, if such wildlife is transported by carrier, and one shall be attached to the wildlife being shipped, transported, or removed from the state. Georgia DNR O.C.G.A. § 27-3-92.

e. Unless otherwise provided by Code Section 27-5-5, it shall be unlawful for any person to import, transport, transfer, sell, purchase, or possess any wild animal listed in Code Section 27-5-5 or specified by the board by regulation without first obtaining a wild animal license from the department.... Georgia DNR O.C.G.A. § 27-5-4(a).

- f. Except as otherwise provided in this chapter, a wild animal license or permit is required for the possession of any wild animal listed in subsection (b) of Code Section 27-5-5 or as required by regulation of the board. Liability insurance is required for the possession of any wild animal that is classified as being inherently dangerous to people in subsection (a) of Code Section 27-5-5 or as required by regulation of the board.... Georgia DNR O.C.G.A. § 27-5-4(f).
- g. The following animals are considered to be inherently dangerous to human beings and are subject to the license or permit and insurance requirements provided for in subsection (f) of Code Section 27-5-4: Class Reptilia; Order Squamata; Family Viperidae (adders, vipers, etc.) – All species. Georgia DNR O.C.G.A. § 27-5-5(a)(2)(B)(II).

6. On or about February 22, 2018, in the Middle District of Georgia and elsewhere, the defendant

**ASHTYN MICHAEL RANCE**

did knowingly engage in conduct that involved the sale and purchase of, the offer of sale and purchase of, and the intent to sell and purchase wildlife with a market value in excess of \$350, that is approximately 16 spotted turtles and three eastern box turtles, and did knowingly sell said wildlife in interstate commerce to a buyer in Kissimmee, Florida, knowing that said wildlife was taken, possessed, and transported in violation of and in a manner unlawful under the laws and regulations of Georgia, specifically Georgia DNR O.C.G.A. §§ 391-4-10-.06(a)(2) and Title 27, all in violation of Title 16, United States Code, Sections 3372(a)(2) and 3373(d)(1).

**COUNT TWO**

**(Lacey Act Trafficking)**

7. Paragraphs Two, Five, and Six are incorporated here.

8. On or about May 10, 2018, in the Middle District of Georgia and elsewhere, the defendant

**ASHTYN MICHAEL RANCE**

did knowingly engage in conduct that involved the sale and purchase of, the offer of sale and purchase of, and the intent to sell and purchase wildlife with a market value in excess of \$350, that is approximately 15 Gaboon vipers, and did knowingly sell said wildlife in interstate commerce to a buyer in Kissimmee, Florida, knowing that said wildlife was taken, possessed, and transported in violation of and in a manner unlawful under the laws and regulations of Georgia, specifically Georgia DNR O.C.G.A. Title 27, all in violation of Title 16, United States Code, Sections 3372(a)(2) and 3373(d)(1).

**COUNT THREE**

**(Lacey Act False Labeling)**

9. On or about February 22, 2018, in the Middle District of Georgia and elsewhere, defendant

**ASHTYN MICHAEL RANCE**

did knowingly make and submit, and cause to be made and submitted, a false record, account, label for, and a false identification of wildlife with a market value greater than \$350, that is a package containing approximately 16 spotted turtles and three eastern box turtles, that were and were intended to be transported in interstate commerce, in that RANCE made and submitted and caused another to make and submit to a shipping company for transport to Florida, a package

label describing the contents as being live tropical fish, 10 Savannah bosc monitors, and 10 Uromastyx-Dabs lizards. All in violation of Title 16, United States Code, Sections 3372(d)(2) and 3373(d)(3)(A)(ii).

**COUNT FOUR**  
**(Lacey Act False Labeling)**

10. On or about May 10, 2018, in the Middle District of Georgia and elsewhere,  
defendant

**ASHTYN MICHAEL RANCE**

did knowingly make and submit, and cause to be made and submitted, a false record, account, label for, and a false identification of wildlife with a market value greater than \$350, that is a package containing approximately 15 Gaboon vipers, that were and were intended to be transported in interstate commerce, in that RANCE made and submitted and caused another to make and submit to a shipping company for transport to Florida, a package label describing the contents as being harmless reptiles and ball pythons. All in violation of Title 16, United States Code, Sections 3372(d)(2) and 3373(d)(3)(A)(ii).

**COUNT FIVE**  
**(Possession of a Firearm by a Convicted Felon)**

On or about May 11, 2018, in the Valdosta Division of the Middle District of Georgia,  
and elsewhere within the jurisdiction of this Court,

**ASHTYN MICHAEL RANCE,**

defendant herein, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year did knowingly possess the following firearms, that is, one (1) Bushmaster Carbine .223 caliber rifle with serial number CRB004822, and, one (1) Mossberg 12-

gauge shotgun with serial number L344825, said firearms having been shipped and transported in interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2) and Title 18, United States Code, Section 2.

TRUE BILL.

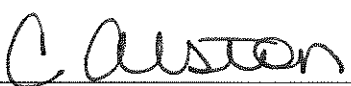
s/ Foreperson of the Grand Jury  
FOREPERSON OF THE GRAND JURY

Presented by:

PETER D. LEARY  
ACTING UNITED STATES ATTORNEY

  
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SONJA B. PROFIT  
ASSISTANT UNITED STATES ATTORNEY

Filed in open court this 9 day of March AD 2021.

  
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Deputy Clerk